

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AVON PRODUCTS, INC.,

Plaintiff,

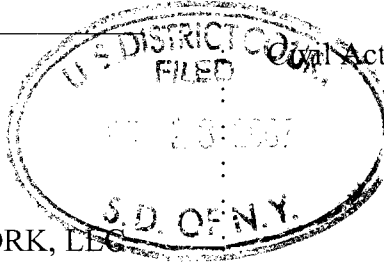
v.

WASTE MANAGEMENT OF NEW YORK, LLC

and

MARANGI BROS., INC.,

Defendants.



Civil Action No. 07-CV-2891

**NOTICE OF MOTION TO
ADMIT COUNSEL
PRO HAC VICE**


TO: John Klock, Esquire
Gibbons PC
Attorneys for Plaintiff
One Pennsylvania Plaza, 37th Floor
New York, NY 10119

PLEASE TAKE NOTICE that upon the accompanying Declarations of Joseph F. O'Dea, Jr., Esquire, Cathleen M. Devlin, Esquire, and Allison B. Newhart, Esquire, and the Certificates of Good Standing annexed thereto, and upon the annexed Declaration of Adrienne C. Rogove, Esquire, in support of the motion, Saul Ewing, LLP, attorneys for Defendants will move this Court, before the Honorable Richard Owen, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, NY 10007, on a date and time to be fixed by the Court for an Order, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, admitting Joseph F. O'Dea, Jr., Esquire, Cathleen M. Devlin, Esquire, and Allison B. Newhart, Esquire *pro hac vice* to appear, argue or try this case in whole or in part as counsel, together with any other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Dated: July 17, 2007

Respectfully submitted,



Adrienne C. Rogove (8567)
SAUL EWING LLP
750 College Road East
Princeton, NJ 08540
(609) 452-3149
*Attorneys for Defendants Waste
Management of New York, LLC and
Marangi Brothers, Inc.*

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AVON PRODUCTS, INC.,

Plaintiff,

v.

WASTE MANAGEMENT OF NEW YORK, LLC
and
MARANGI BROS., INC.,

Defendants.

Civil Action No. 07-CV-2891

**DECLARATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

ADRIENNE C. ROGOVE, ESQUIRE declares and says:

1. I am a partner of the law firm of Saul Ewing LLP, attorneys for Defendants Waste Management of New York, LLC and Marangi Brothers, Inc. ("Defendants") in the above-captioned action. I make this declaration in support of the application to admit my colleagues, Joseph F. O'Dea, Jr., Esquire, Cathleen M. Devlin, Esquire, and Allison B. Newhart, Esquire, from the law firm Saul Ewing LLP *pro hac vice* to represent Defendants in this action.

2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in July 1995. I am also admitted in the Southern District of New York and am in good standing with these Courts.

Joseph F. O'Dea, Jr., Esquire

3. Joseph F. O'Dea, Jr., Esquire who is my partner at Saul Ewing LLP and the Chair of our Litigation Department, is a highly capable attorney and of high integrity.

4. I have found Mr. O'Dea to be knowledgeable, both on substantive and procedural matters, and to be familiar with the Federal Rules of Civil Procedure and applicable local rules.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AVON PRODUCTS, INC.,

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: Civil Action No. 07-CV-2891

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**DECLARATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL
*PRO HAC VICE***

JOSEPH F. O'DEA, JR., ESQUIRE declares and says:

1. I am a partner of the law firm of Saul Ewing LLP.

2. I submit this declaration in support of the motion of Adrienne C. Rogove, Esquire for admission to practice *pro hac vice* in the above-captioned action.

3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the Commonwealth of Pennsylvania.

4. I have been a member of the Bar of the Commonwealth of Pennsylvania since 1986.

5. I have represented Waste Management of New York, LLC, and its affiliated companies, including Marangi Brothers, Inc., for many years. In addition, I have much experience with and knowledge of litigation involving the underlying subject matter. Defendants Waste Management of New York, LLC and Marangi Brothers, Inc. have specifically requested that I represent them in this case because of our long-standing relationship, my familiarity with their business and my experience with the subject matter of the type underlying this litigation.



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Joseph F. O'Dea, Jr., Esq.

DATE OF ADMISSION

December 16, 1986

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: June 25, 2007**

John W. Person, Jr., Esq.
Deputy Prothonotary

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AVON PRODUCTS, INC.,

Plaintiff,

v.

WASTE MANAGEMENT OF NEW YORK, LLC

and

MARANGI BROS., INC.,

Defendants.

: Civil Action No. 07-CV-2891

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**DECLARATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL
*PRO HAC VICE***

CATHLEEN M. DEVLIN, ESQUIRE declares and says:

1. I am a partner of the law firm of Saul Ewing LLP.

2. I submit this declaration in support of the motion of Adrienne C. Rogove,

Esquire for admission to practice *pro hac vice* in the above-captioned action.

3. As shown in the Certificates of Good Standing annexed hereto, I am a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey.

4. I have been a member of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey since 1994.

5. I have represented Waste Management of New York, LLC, and its affiliated companies, including Marangi Brothers, Inc., for many years. In addition, I have much experience with and knowledge of litigation involving the underlying subject matter. Defendants Waste Management of New York, LLC and Marangi Brothers, Inc. have specifically requested

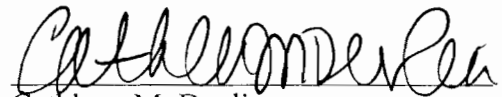
that I represent them in this case because of our long-standing relationship, my familiarity with their business and my experience with the subject matter of the type underlying this litigation.

6. There are no pending disciplinary proceedings against me in any State or Federal Court.

7. Wherefore, I respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* for Defendants in this one case.

Dated: Philadelphia, PA
July 6, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cathleen M. Devlin", written over a horizontal line.

Cathleen M. Devlin

Saul Ewing LLP

Centre Square West

1500 Market St., 38th Floor

Philadelphia, PA 19102

(215) 972-8562

Supreme Court of New Jersey

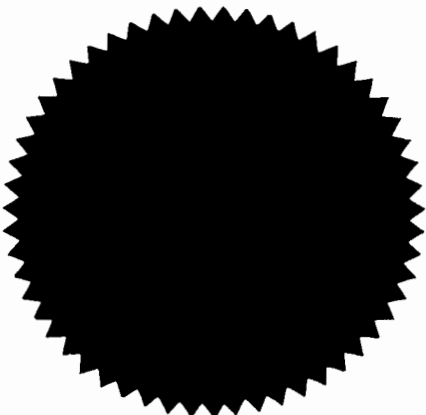


Certificate of Good Standing

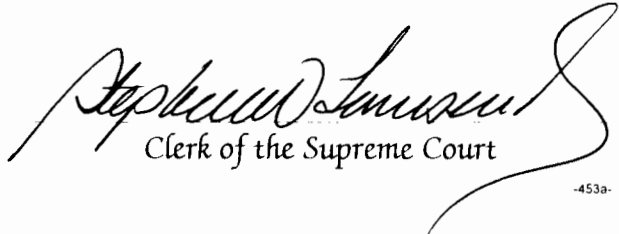
This is to certify that **CATHLEEN MARIE DEVLIN**
(No. **035111994**) was constituted and appointed an Attorney at Law of New
Jersey on **December 20, 1994** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
27TH day of **June**, 20 **07**


Clerk of the Supreme Court



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Cathleen Marie Devlin, Esq.

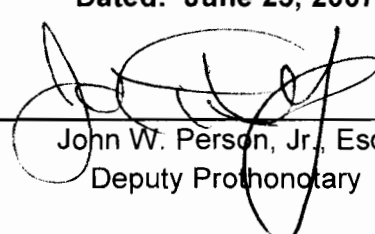
DATE OF ADMISSION

December 6, 1994

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: June 25, 2007**



John W. Person, Jr., Esq.
Deputy Prothonotary

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AVON PRODUCTS, INC.,

Plaintiff,

v.

WASTE MANAGEMENT OF NEW YORK, LLC

and

MARANGI BROS., INC.,

Defendants.

: Civil Action No. 07-CV-2891

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**DECLARATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL
*PRO HAC VICE***

ALLISON B. NEWHART, ESQUIRE declares and says:

1. I am an associate in the law firm of Saul Ewing LLP.

2. I submit this declaration in support of the motion of Adrienne C. Rogove,

Esquire for admission to practice *pro hac vice* in the above-captioned action.

3. As shown in the Certificates of Good Standing annexed hereto, I am a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey.

4. I have been a member of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey since 2005.

5. I work closely with Joseph F. O'Dea, Jr., Esquire and Cathleen M. Devlin, Esquire as an associate in the Litigation Department in the law firm of Saul Ewing LLP. Because I work closely with Mr. O'Dea and Ms. Devlin, I have begun to acquire knowledge of the business of Waste Management of New York as well as experience with and knowledge of

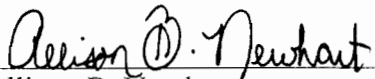
the subject matter underlying the litigation. Accordingly, Mr. O'Dea and Ms. Devlin have requested that I be involved with this case.

6. There are no pending disciplinary proceedings against me in any State or Federal Court.

7. Wherefore, I respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* for Defendants in this one case.

Dated: Philadelphia, PA
July 6, 2007

Respectfully submitted,


Allison B. Newhart
Saul Ewing LLP
Centre Square West
1500 Market St., 38th Floor
Philadelphia, PA 19102
(215) 972-7191

Supreme Court of New Jersey

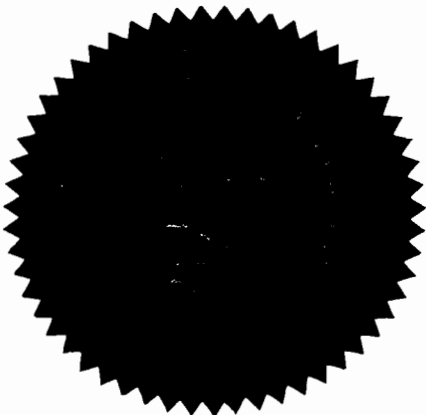


Certificate of Good Standing

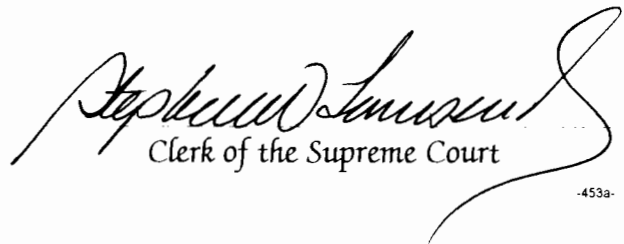
This is to certify that **ALLISON B NEWHART**
(No. **012152005**) was constituted and appointed an Attorney at Law of New
Jersey on **November 30, 2005** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
27TH day of **June** , 20 **07**


Clerk of the Supreme Court



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Allison Beth Newhart, Esq.

DATE OF ADMISSION

October 18, 2005

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: June 25, 2007**

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'P'.

John W. Person, Jr., Esq.
Deputy Prothonotary

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 07-CV-2891

AVON PRODUCTS, INC.,

Plaintiff,

v.

WASTE MANAGEMENT OF NEW YORK, LLC

and

MARANGI BROS., INC.,

Defendants.

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**ORDER
ADMISSION TO PRACTICE
PRO HAC VICE**

ORDER

This matter having been opened to the Court by Saul Ewing LLP, counsel for Defendants Waste Management of New York, LLC and Marangi Brothers, Inc. for an Order pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, admitting Joseph F. O'Dea, Jr., Esquire, Cathleen M. Devlin, Esquire, and Allison B. Newhart, Esquire, *pro hac vice* to appear, argue or try this particular case in whole or in part as counsel, and the Court having considered the papers submitted in support of and in opposition, if any, and the Court having heard oral argument, and for good cause shown, on this _____ day of _____, it is

ORDERED that the motion for admission to practice *pro hac vice* is hereby granted, and Joseph F. O'Dea, Jr., Esquire, Cathleen M. Devlin, Esquire, and Allison B. Newhart, Esquire are permitted to appear, argue or try this particular case in whole or in part as counsel or advocate; and it is

FURTHER ORDERED that the aforesaid attorneys shall each be required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy in the Clerk's Office

and that when paying by mail, each attorney shall return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of counsel's admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorneys admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

RICHARD OWEN, U.S.D.J.

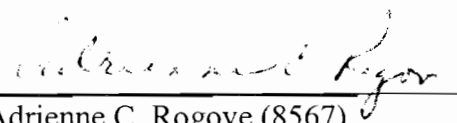
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AVON PRODUCTS, INC.,	:	
	:	
Plaintiff,	:	Civil Action No. 07-CV-2891
v.	:	
	:	
WASTE MANAGEMENT OF NEW YORK, LLC	:	
and	:	
MARANGI BROS., INC.,	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I, **Adrienne C. Rogove, Esquire**, counsel for Defendants Waste Management of New York LLC and Marangi Bros., Inc., hereby certify that on this 17th day of July 2007, I caused a true and correct copy of the foregoing **Motion for Admission *Pro Hac Vice* and accompanying Declarations** to be served via first class mail to the following counsel of record:

John Klock, Esquire
Gibbons PC
One Pennsylvania Plaza, 37th Floor
New York, NY 10119
Attorney for Plaintiff



Adrienne C. Rogove (8567)
SAUL EWING LLP
750 College Road East, Suite 100
Princeton, NJ 08540-6617
(609) 452-3149
Attorneys for Defendants
Waste Management of New York,
LLC and Marangi Bros., Inc.

Dated: July 17, 2007